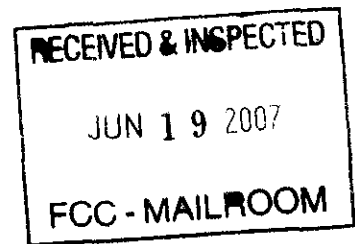


CGB-CC-0725



To: Federal Communications Commission's Secretary,
Office of the Secretary Attention: CGB Room 3-B431
445 12th Street S.W. Washington, DC 20554

Flavio Guerra
G & M Advertising, LLC
6400 Laurel Canyon Ave, Suite 250
No. Hollywood, CA 91606
T: 818-769-0600
F: 818-769-0603

June 13, 2007

Re: Request for Exemption from Closed Captioning

Dear Sir or Madam,

Our company, G & M Advertising, LLC, produces in-house a 30 minute paid program for local car dealers that, airs locally in Los Angeles, California. Our program is a 30 minute video of new and pre-owned cars. In the show, we spend 30 seconds to about a minute showcasing new and pre-owned cars. Various shots include the exterior and interior parts of the car and any distinct features. We have produced and locally aired this type of show for little over six years and since the beginning we have produced the show in such a way that the video images of the featured cars are viewed on a full screen: this allows for graphics and text to be superimposed on the screen throughout the program. The graphics and text contains all of the pertinent information about the car that is currently appearing on screen, such as car price, monthly payments, contact phone numbers, and location. The text information stays on-screen until the next car is introduced. Audibly the announcer describes the cars. As you can imagine our program by way of its existing format, is extremely informative to our hearing impaired audience.

We would like to petition the FCC for an exemption from adding Closed Captioning to our program for the following reasons:

1. Our program is a non-news, locally produced show that airs locally, features new and pre-owned cars for sale and because of an active market for new and pre-owned cars the show by nature has to constantly have to replace the program every week to two weeks. If we were required to send our show out to the service that would add Closed Captioning to our program, in a best case over-night shipping scenario, we would add a minimum of three days to the time it would take for our show to be updated, not only would that severely affect our business promise to our clients, and a car being aired on that specific program can be sold in those 6 to 7 days before the program would actually hit the air. Also the same would apply to a car that was sold where it would take 4 to 5 days before the program could be pulled off the air.
2. While our program is not a Community Bulletin Board a majority of our audio content is displayed visually with on-screen text that occupies over 40% of the screen throughout 95% of the total program. If Closed Captioning were added it would either be positioned to cover over our existing text causing a jumble of characters, or if Closed Captions were positioned over the video showcasing the car, it would impair the viewers chance to see for instance the interior features of the car.



be repeated and that will be air many times over and over. But with regards to our program we would hope that for the reasons listed, the FCC and the reviewing organizations will allow our program an exemption from Closed Captioning requirements.

Sincerely,

A handwritten signature in black ink, appearing to read 'Flavio Guerra', with a long horizontal line extending to the right.

Flavio Guerra
Producer/Director